

JOHN BAL

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January 12, 2014

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Judge Colleen McMahon
c/o Pro Se Office
United States Courthouse
500 Pearl Street, Room 1640
New York, NY 10007

**Re: Request to submit an Amended Complaint
Bal v. Itex Corporation, et al. 13 CV 6794 (CM)**

Dear Judge McMahon:

MEMO ENDORSED

I am the plaintiff *pro se* in the above matter. Presently, I am in Chiang Mai, Thailand and expect to be here until April 16, 2014. During this period, my contact address (email) is: nycjohn123@msn.com. I will be in transit a portion of this time. A hospital that provides my medical testing is in Bangkok, 433 miles away, and Thai immigration law requires me to periodically leave and re-enter Thailand). I consent to service of court papers by electronic mail.

In two separate pending motions, the defendants are seeking a more definite statement regarding the complaint against them. To avoid delay, I will participate in this lawsuit as much as I can while I am temporarily in Thailand. I respectfully ask the court to accept this letter.

In response to the defendants' motions, I respectfully request: 1) court consent to file an amended complaint within 60 days from the date of the court's order and 2) the defendants' motions for a more definitive statement be stayed until after their receipt of my amended complaint.

The amended complaint will more definitively state the causes of actions.

Under penalty of perjury, I affirm that I served this letter upon the attorneys for the defendants at 11:58 PM (EST) on January 12, 2014 by electronic mail.

Respectfully,

John Bas ^{W.} *the*
Agent *Dec 15, 14*

- JB/

c: Joseph Maira, Esq. (by email)
Jeremy Goldman, Esq. (by email)

2/13/14